

ROB BONTA
Attorney General of California
ABIGAIL BLODGETT
Supervising Deputy Attorney General
STACY J. LAU (SBN 254507)
JENNIFER LODA (SBN 284889)
Deputy Attorneys General
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1973
Fax: (510) 622-2270
E-mail: Stacy.Lau@doj.ca.gov

Attorneys for Plaintiff State of California

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STATE OF CALIFORNIA, STATE OF
NEW YORK, COMMONWEALTH OF
PENNSYLVANIA, STATE OF
COLORADO, STATE OF
CONNECTICUT, STATE OF
DELAWARE, STATE OF ILLINOIS,
STATE OF MAINE, STATE OF
MARYLAND, PEOPLE OF THE STATE
OF MICHIGAN, STATE OF NEW
JERSEY, STATE OF NEW MEXICO,
STATE OF NORTH CAROLINA, STATE
OF OREGON, STATE OF RHODE
ISLAND, STATE OF VERMONT, STATE
OF WASHINGTON, DISTRICT OF
COLUMBIA, CITY OF NEW YORK, and
the BAY AREA AIR QUALITY
MANAGEMENT DISTRICT,

Plaintiffs,

V.

**UNITED STATES POSTAL SERVICE,
and LOUIS DEJOY, in his official capacity
as United States Postmaster General,**

Defendants.

Case Nos. 3:22-cv-02583-RFL
3:22-cv-02576-RFL

**DECLARATION OF STACY J. LAU IN
SUPPORT OF STIPULATION
REGARDING MOTION HEARING
AND BRIEFING DEADLINES**

**CLEANAIRNOW; CENTER FOR
BIOLOGICAL DIVERSITY; and SIERRA
CLUB,**

Plaintiffs,

V.

**LOUIS DEJOY, in his official capacity as
U.S. Postmaster General; and U.S. POSTAL
SERVICE,**

Defendants.

I, Stacy J. Lau, declare as follows:

11 1. I am a Deputy Attorney General representing Plaintiff State of California in this matter.
12 2. Plaintiffs State of California, State of New York, Commonwealth of Pennsylvania, State
13 of Connecticut, State of Delaware, State of Illinois, State of Maine, State of Maryland, People of
14 the State of Michigan, State of New Jersey, State of New Mexico, State of North Carolina, State
15 of Oregon, State of Rhode Island, State of Vermont, State of Washington, District of Columbia,
16 City of New York, The Bay Area Air Quality Management District, CleanAirNow, Center for
17 Biological Diversity, and Sierra Club (“Plaintiffs”) and Defendants United States Postal Service
18 and Louis DeJoy, in his official capacity as United States Postmaster General (“Defendants”), are
19 exploring whether there may be ways to resolve this case amicably and believe that the Parties
20 could benefit from a modest extension to the briefing schedule to have discussions.

21 3. After receiving the Clerk’s Notice Regarding Motion Hearing (CleanAirNow Dkt. 105;
22 Gov’t Dkt. 178), the parties met and conferred and stipulated to continue the hearing on the
23 parties’ cross-motions for summary judgment to a mutually agreeable date. During this meet and
24 confer process, the parties also agreed to seek a 14-day extension of time for Plaintiffs to file their
25 Opposition to Defendants’ and Defendant-Intervenor’s Cross-Motions for Summary Judgment
26 and Reply in Support of Plaintiffs’ Motion for Summary Judgment, and a 10-day extension of

1 time for Defendants and Defendant-Intervenor to file their Replies in Support of Defendants'
 2 Cross-Motion for Summary Judgment, as follows:

Document to be Filed	Current Deadline	Proposed Deadline
Plaintiffs' Opposition to Defendants' and Defendant-Intervenor's Cross-Motions for Summary Judgment and Reply in Support of Plaintiffs' Motion for Summary Judgment	9/6/2024	9/20/2024
Defendants' Reply in Support of Cross-Motion for Summary Judgment	10/7/2024	10/30/2024
Defendant-Intervenor's Reply in Support of Cross-Motion for Summary Judgment	10/15/2024	11/6/2024
Joint Appendix	10/22/2024	11/13/2024
Conformed Briefs	10/29/2024	11/20/2024
Hearing on Cross-Motions for Summary Judgment	11/19/2024	12/17/2024

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 14. There have been no previous time modifications of the briefing schedule in this action.

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 16 Dated: August 19, 2024



STACY J. LAU
Declarant